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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARLE CORDEIRO,

Plaintiff,

vs.

MICHAEL L. POSTLE,

Defendant.

Case No.: 2:20-cv-00640-JCM-EJY

**STIPULATION AND ORDER TO STAY
CASE PENDING RESOLUTION OF
DEFENDANT’S MOTION TO DISMISS
PLAINTIFF’S COMPLAINT FOR LACK
OF JURISDICTION, OR, IN THE
ALTERNATIVE, BASED ON FORUM
NON CONVENIENS [ECF NO. 10]**

Defendant Michael L. Postle (“Defendant”), by and through his attorneys of record, the law firm MAIER GUTIERREZ & ASSOCIATES and Plaintiff Marle Cordeiro (“Plaintiff”), by and through her attorneys of record, THE VERSTANDIG LAW FIRM, LLC, hereby stipulate and request that the Court order a 30 (thirty) day stay of this matter, from July 6, 2020, the date Defendant’s Motion was fully briefed, pending resolution of Defendant’s Motion to Dismiss Plaintiff’s Complaint for lack of personal jurisdiction, or, in the alternative, based on forum non conveniens [ECF No. 10] filed on June 16, 2020. On June 29, 2020, Plaintiff filed an opposition to Defendant’s motion to dismiss Plaintiff’s complaint for lack of personal jurisdiction, or, in the alternative, based on forum non conveniens [ECF No. 11]. On July 6, 2020 Defendant filed his Reply in Support of his Motion to Dismiss. [ECF No. 12].

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1 The parties are preparing to conduct discovery but want to be as efficient as possible, in
2 terms of both time and costs, and refrain from conducting expensive and time-consuming discovery
3 if it is unnecessary. The parties are hopeful that Defendant's Motion to Dismiss will be decided by
4 the end of the thirty days.

5 This is the parties' first request for a stay. The request in good faith and not for the purpose
6 of delay. It is important to note that a trial date has not yet been set in this case, and as such, the trial
7 will not need to be postponed due to the requested stay.

8 Based on the foregoing, the parties respectfully request that the Court enter an order staying
9 this matter until August 5, 2020.

10 DATED this 21st day of July 2020.

DATED this 21st day of July 2020.

11 **MAIER GUTIERREZ & ASSOCIATES**

THE VERSTANDIG LAW FIRM, LLC

12 */s/ Joseph N. Mott*

/s/ Maurice VerStanding

13 _____
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17 Las Vegas, Nevada 89148

Attorneys for Defendant Michael L. Postle

18 **IT IS SO ORDERED.**

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UNITED STATES DISTRICT JUDGE

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22 DATED August 5, 2020.
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